

FILED

AUG 05 2019

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

1) STEPHEN PARMENTER,

Plaintiff,

v.

1) CITY OF NOWATA,
OKLAHOMA,

Defendant.

19 CV 431 TCK - JFJ

Case No.:

ATTORNEYS' LIEN CLAIMED

JURY TRIAL DEMANDED

Frank W. Frazier

COMPLAINT

COMES NOW Plaintiff and for his claims and causes of action against Defendant states and alleges:

1. Plaintiff, Stephen Parmenter, is a resident of Nowata County, Oklahoma.
2. Defendant, City of Nowata, Oklahoma, is a municipal corporation in the Northern District of Oklahoma.
3. Jurisdiction of this court is invoked pursuant to 28 U.S.C. § 1331, in that this action arises under federal laws, including, but not limited to, 42 U.S.C. § 1983. The supplemental jurisdiction of this court for state law claims is invoked under 28 U.S.C. § 1367.
4. For over five years up until April 8, 2019, Plaintiff was the non-probationary fire chief of the City of Nowata, which was subject to 11 O.S. § 29-104.
5. On April 8, 2019, Plaintiff was terminated without cause, and with neither pre-termination nor post-termination procedures.

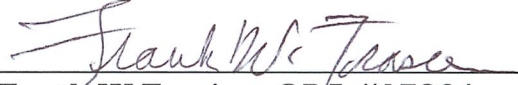
Ken P. Summers

6. As a result of this violation of Plaintiff's civil rights, he has lost wages and other benefits of employment, including harm to his retirement, has lost his job, has endured humiliation and emotional distress.
7. Plaintiff timely has made notice on the City of Nowata under the Oklahoma Governmental Tort Claims Act, which was denied, and this lawsuit timely commences.

WHEREFORE, premises considered, Plaintiff prays for judgment against Defendant in the sum of \$500,000, interest, costs, attorneys' fees, reinstatement to his job position, other equitable relief, and any and all other relief to which he is deemed entitled.

Respectfully submitted,

FRASIER, FRASIER & HICKMAN, LLP

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